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October 12, 2018

Via Certified Mail: 9314 7699 0430 0051 6757 73
and Via E-mail: hohman.darla@epa.gov

Ms. Darla Hohman
U.S. Environmental Protection Agency, Region 8 (8ENF-W-WO)
1595 Wynkoop Street
Denver, CO 80202-1129

Re: Request for Information Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. §1318(a), NRC Report Numbers: 1101176, 1150650, and 1153322

Dear Ms. Hohman,

We represent Halcón Resource Corporation ("Halcón"). Please find enclosed Halcón's responses to the U.S. Environmental Protection Agency Clean Water Act Section 308 Request for Information dated August 22, 2018, concerning the above-referenced National Response Center ("NRC") report numbers. We have enclosed two sets of responses for each of the two incidents associated with these NRC report numbers: one for the incident that occurred on November 16, 2014 (NRC Report Number 1101176) and one for the incident that occurred on June 14, 2016 (NRC Report Numbers 1150650 and 1153322). A copy of the Statement of Certification signed by a duly authorized official of Halcón is enclosed following these responses, with the original Statement of Certification being submitted under separate cover directly from Halcón. In addition, due to the volume of attachments to the Responses, a web link with access to all of the documents referenced in the Responses has been provided to you by e-mail.

Should you have any questions or need any additional information, please contact me at 512-469-6135 or ashley.phillips@tklaw.com.

Best regards,

Ashley T.K. Phillips

Enclosures

cc: **Via E-mail:** Sheldon Muller, U.S. Environmental Protection Agency, Region 8 (8ENF-L) (muller.sheldon@epa.gov)

Halcón Resources Corporation
Responses to Request for Information Concerning NRC Report No. 1101176 (Yale Pad)

1. Describe the facility (e.g., flowline, gathering line, tank, well and/or tank battery, truck, railcar, etc.) from which the oil or other pollutant was discharged on or about November 14, 2016, and June 14, 2016, (hereinafter referred to as "Facility").

   Response: The facility associated with NRC Report #1101176 (November 16, 2014) is an oil and gas production facility known as the Yale Pad. The release point for the referenced incident was a flare stack. At the time of the incident, the facility consisted of six oil and natural gas wells and associated process equipment and aboveground storage tanks for produced fluids.

   a. Give the lease name and number.

      Response: The six wells included the Fort Berthold 148-95-22C-15-4H (API # 330-250-2091), Fort Berthold 148-95-22C-15-5H (API # 330-250-2093), Fort Berthold 148-95-22C-15-9H (API # 330-250-2661), Fort Berthold 148-95-27B-34-4H (API # 330-250-2090), Fort Berthold 148-95-27B-34-5H (API # 330-250-2092), and Fort Berthold 148-95-27B-34-8H (API # 330-250-2260).

   b. Provide the API numbers and/or other numbers for all wells associated with the Facility.

      Response: See Response to 1.a. above.

   c. Describe the operations and all business activities conducted at the Facility.

      Response: Facility operations included production of oil and natural gas from the wells, with primary oil and water takeaway via lease automatic custody transfer ("LACT")/pipeline.

2. Identify the current owner and operator (and percentage ownership interest) of the Facility, and provide the current owner's Dun & Bradstreet number. Also, identify all owners and operators of the Facility for the last two years, and the parent corporation or other entity (if any) of the current owner and operator. If the current owner is not the original owner of the Facility, also state when the current owner purchased the Facility and identify the person from whom the Facility was purchased.

   Response: To our knowledge, the current owner and operator of the facility is Bruin E&P Operating, LLC, a subsidiary of Bruin E&P Partners, LLC. Halcón does not have the Dun & Bradstreet number for Bruin E&P Operating, LLC. The only other owner and operator of the facility within the past two years was HRC Operating Company, LLC (Halcón), a subsidiary of Halcón Resources Corporation. The leases attributable to the facility were previously owned by Halcón Williston I, LLC; they are currently owned by Bruin Williston I, LLC. The parent company to Bruin Williston I, LLC is believed to be Bruin E&P Partners, LLC. The current percentage of ownership interest in the Bruin entities is not known to Halcón. Halcón sold this facility and the

associated leases as part of a transaction that closed on September 7, 2017, with an effective date of June 1, 2017. Bruin commenced operation of the facility on November 21, 2017.

3. Provide the following information for the current owner and operator, the parent of the current owner and operator, and the owner and operator at the time of the discharge (if not the current owner or operator).

Current Owner/Operator/Parent Company:

a. Type of business unit (e.g., corporation, partnership, LLC. etc.).

Response: Bruin Williston I, LLC is a limited liability company and the successor company of Halcón Williston I, LLC. Bruin Williston I, LLC acquired the leases associated with the facility via an acquisition of the entity that owned them (Halcón Williston I, LLC) and subsequently changed the name of the company to Bruin Williston I, LLC. To Halcón's knowledge, Bruin Williston I, LLC is now owned either directly or indirectly by Bruin E&P Partners, LLC. The current owner and operator of the facility is Bruin E&P Operating, LLC (a limited liability company), which is 100% owned by Bruin E&P Partners, LLC (also a limited liability company).

b. The date the business was incorporated or organized. The date the business first acquired ownership in or began operating the Facility.

Response: Halcón Williston I, LLC (the predecessor of Bruin Williston I, LLC) was organized on November 28, 2012. The dates of organization of Bruin E&P Operating, LLC and Bruin E&P Partners, LLC are unknown to Halcón. Bruin first acquired ownership of the facility as part of a transaction that closed on September 7, 2017, with an effective date of June 1, 2017, and Bruin E&P Operating, LLC began operating the facility on November 21, 2017.

c. The state where the business was first incorporated or organized, and the state where it is authorized to do business. Provide copies of all documents filed with the state where the business was incorporated or organized since the time of incorporation or organization until today, and all such documents filed with the State of North Dakota.

Response: Halcón Williston I, LLC (the predecessor of Bruin Williston I, LLC) was first organized in Delaware. Halcón does not have knowledge of where Bruin E&P Operating, LLC and Bruin E&P Partners, LLC were first organized. Each of these companies is authorized to do business in North Dakota, but Halcón has no knowledge of whether these companies are authorized to do business in other states.

d. If the business is a corporation, identify all of its corporate officers. If the business is a limited liability company, identify all of its members and

managing members/managers. If the business is a partnership, identify all of its limited and general partners.

Response: Information pertaining to the members and managing members/managers of the Bruin entities is not publicly available.

e. If the owner and operator of the Facility are different, describe the relationship between them (i.e. employee, subcontractor, lessee, etc.). State when the current operator first began operating the Facility, and when the operator at the time of the discharge first began operating the Facility (if different than the current operator).

Response: The current owner of the underlying leases and the owner and operator of the facility are separate entities but affiliated. Bruin E&P Operating, LLC began operating the facility on November 21, 2017.

Owner and Operator at the Time of the Discharge

a. Type of business unit (e.g., corporation, partnership, LLC. etc.).

Response: Halcón Williston I, LLC, the owner of the underlying leases at the time of the discharge, is a limited liability company and is currently named Bruin Williston I, LLC. HRC Operating, LLC, a limited liability company, was the owner and operator of the facility at the time of the discharge.

b. The date the business was incorporated or organized. The date the business first acquired ownership in or began operating the Facility.

Response: Halcón Williston I, LLC was organized on November 28, 2012. HRC Operating, LLC was originally formed on March 7, 2007. Halcón Williston I, LLC acquired ownership of the leases associated with the facility and HRC Operating, LLC acquired ownership of the facility as the result of a transaction that closed on December 6, 2012, with an effective date of June 1, 2012. HRC Operating, LLC began operating the Yale Pad around April 12, 2014, when the facility experienced first production.

c. The state where the business was first incorporated or organized, and the state where it is authorized to do business. Provide copies of all documents filed with the state where the business was incorporated or organized since the time of incorporation or organization until today, and all such documents filed with the State of North Dakota.

Response: Halcón Williston I, LLC was first organized in Delaware, was subsequently converted to a Texas entity, and is authorized to do business in North Dakota. HRC Operating, LLC was originally formed in Colorado; it was qualified to do business in North Dakota at the time of the discharge. HRC Operating, LLC is also qualified to do business in Kansas, Montana, Texas, and Utah.

d. If the business is a corporation, identify all of its corporate officers. If the business is a limited liability company, identify all of its members and managing members/managers. If the business is a partnership, identify all of its limited and general partners.

Response: The officers and members of Halcón Williston I, LLC at the time of the discharge are listed below.

- Officers:
  - Floyd Wilson, CEO and President
  - Steve Herod, EVP, Corporate Development
  - Mark Mize, EVP, CFO and Treasurer
  - David Elkouri, EVP and Chief Legal Officer
  - Jon Wright, COO
- Member:
  - Halcón Energy Properties, LLC.

The officers and members of HRC Operating, LLC at the time of each discharge are listed below.

- Officers:
  - Floyd Wilson, CEO and President
  - Steve Herod, EVP, Corporate Development
  - Mark Mize, EVP, CFO and Treasurer
  - David Elkouri, EVP and Chief Legal Officer
  - Jon Wright, COO
- Member:
  - Halcón Energy Properties, Inc.

e. If the owner and operator of the Facility are different, describe the relationship between them (i.e. employee, subcontractor, lessee, etc.). State when the current operator first began operating the Facility, and when the operator at the time of the discharge first began operating the Facility (if different than the current operator).

Response: At the time of the discharge, the owner of the underlying leases and the owner and operator of the facility were separate entities but affiliated. HRC Operating, LLC began operating the Fletcher Pad on March 1, 2013 following acquisition of the site from Petro-Hunt, LLC in the transaction that closed on December 6, 2012. HRC Operating, LLC began operating the Yale Pad around April 12, 2014, when the facility experienced first production.

4. State the time and date of the discharge and how this was determined.

a. When was the discharge discovered (time and date)?

Response: The discharge was discovered at 7:15 AM CST on November 16, 2014.

b. Identify the individual who first discovered the discharge and how that individual discovered it.

Response: A Halcón lease operator, Tristan Williams, discovered the discharge upon entering the facility to perform daily production and measurement activities. The wells at the facility were not in service at the time of discovery of the discharge because well shutdown had already been triggered.

c. Describe how long the discharge continued.

Response: The discharge is believed to have occurred between 6:30 AM and 7:15 AM on November 16, 2014. During this period, the facility did not have personnel present after the contract night operator left the facility and prior to Halcón's day lease operator entering the facility. The discharge is believed to have been an instantaneous event which occurred prior to the high level switch in the flare knockout pot detecting the fluid level and triggering a shut in of well production.

d. State the weather conditions, including temperature, precipitation, cloud cover, etc. during the discharge.

Response: The temperature during the discharge was approximately 14°F with cloudy sky conditions and precipitation in the form of snow. It was noted that the wind was coming out of the west/northwest at a speed of approximately 30-35 MPH.

e. Provide all documents that relate in any way to your responses to this question and its subparts.

Response: The internal spill report is enclosed.

5. Describe the oil or other pollutant discharged, including the chemical name, formula, and specific gravity. If the discharge was a mixture, give the percentages of oil or other pollutant in the mixture or solution. Provide copies of the Safety Data Sheets, if available.

Response: The fluid discharge was comprised of crude oil with a specific gravity of 0.79 to 0.83. Due to the presence of hydrogen sulfide within the well stream produced at this facility, the crude oil is considered sour. A Safety Data Sheet (SDS) for the sour crude is enclosed.

6. If the oil or other pollutant discharged is a hazardous substance under section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9601(14), identify that hazardous substance.

Response: Crude oil is not identified as a hazardous substance under section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42

U.S.C §9601(14).

7. Describe the quantity of each oil or other pollutant that was discharged, the quantity of each oil or other pollutant that entered or may have entered any water or its adjoining shorelines, and how those quantities were determined.

   Response: Halcón's internal investigation of the subject incident identified that the total discharged quantity of crude oil was estimated to be 25 gallons. Of this quantity, it was determined that 1 gallon reached an iced-over unnamed creek. The remainder of the discharge, 24 gallons of crude oil, was released onto snow and vegetation covering land in the area of the facility. Dimensions of the impacted areas were determined by a site investigation, and the dimensions were then utilized within a volume estimate worksheet to calculate the discharged quantity.

   a. State the type, total capacity and purpose of the Facility, from which each pollutant was discharged.

      Response: The discharge point was a 50 foot tri-tip vertical flare, Model MGAJ-3, manufactured by Zeeco, Inc. Gas from the 2-phase separators, 3-phase heater treaters, vapor separation towers, and working/breathing/flash gas from the oil and water storage tanks were routed to this flare. At the time of the discharge, the flare was in service at the production facility as an emission control device.

   b. Provide all documents that relate in any way to your determination of such quantities.

      Response: The volume estimate worksheet is enclosed.

8. If the discharge was from a flowline or gathering line also indicate the size and daily throughput of that flowline or gathering line.

   Response: N/A. This discharge relating to this incident was not from a flowline or gathering line.

9. Provide details on the specific location of the discharge, including:

   a. The latitude, longitude, datum, county and state.

      Response: The discharge occurred at 47° 37' 1" N, 102° 46' 13" W in Dunn County, North Dakota.

   b. The street address and city, if applicable. N/A.

      Response: There is no street address for this facility or the location of the discharge.

   c. The township, range, quarter-sections and fractions for rural areas.

Response: The legal description of the discharge is the NENW Section 27 Range 148 West Township 95 North.

10. Describe the land status (i.e. fee, trust, tribal, federal, or allotted) of any lands impacted by the discharge if the discharge occurred within the exterior boundaries of an Indian reservation.

    Response: The discharge occurred on tribal land located within the Fort Berthold Indian Reservation.

11. Provide copies of the analyses of any samples of the discharged oil or other pollutant collected and analyzed, and any other analyses that were conducted as part of the response to the discharge. Describe the locations from which the samples were collected including: latitude, longitude and datum; the date and time the samples were collected; and identify who collected the samples and the laboratory that conducted the analyses.

    Response: Subsequent soil samples were collected when weather permitted on April 22, 2015. Analytical reports for the sampling event provide sample collection and laboratory details. Samples were collected by a representative of the Halcón EHS Department. A site diagram depicts the sample collection locations for the sampling event. The analytical reports and site diagram are also enclosed.

12. State if the oil or other pollutant discharged reached or threatened to reach any waterway or body of water (water) or a water's adjoining shoreline, or any drainage leading to that water, including any wetlands, marshes or sewers. If it did:

    a. Provide the name of that water and drainage leading to that water, and describe it, including its width and depth, flow, direction, and condition at time of discharge *(e.g.,* low, flooded, quiet, turbulent, and dry).

       Response: A mist of crude oil reached an unnamed tributary of the Little Missouri River. Because the waterway was frozen, live water was not present at the time of the discharge.

    b. State each use of the water *(e.g.,* drinking, agriculture, ranching, recreation, commerce).

       Response: Water use of this unnamed tributary is unknown.

    c. Describe the overland pathway(s) from the specific source within the Facility to the water and to any drainage connecting to that water, including distance, direction, and elevation. Provide diagrams and topographic or other maps.

       Response: The discharge did not have an overland pathway. Rather, the discharge was a mist that was released from an elevated flare. The adjoining shoreline of the

unnamed tributary is located approximately 195 feet from the flare. Due to windy conditions at the time of the release, the mist traveled southeast from the flare tip (50 feet above ground) through the air, impacting both land and the unnamed tributary up to approximately 825 feet of the facility. See also the site map of the affected area included in the Incident Briefing Report provided in the Response to No. 15 below.

d. State the quantity of oil or other pollutant that reached the water and how the amount was determined.

Response: 1 gallon of crude oil reached the unnamed tributary. Because the waterway was frozen, live water was not present at the time of the discharge. This quantity was determined based on a site investigation and utilization of a volume calculator by Halcón to determine released quantities. Please also see the Response to No. 7 above.

e. State the quantity of oil or other pollutant that did not reach the water and how that amount was determined.

Response: 24 gallons of crude were discharged onto land and vegetation to the southeast from the site but did not enter the unnamed tributary. This quantity was determined based on a site investigation and utilization of a volume calculator used by Halcón to determine released quantities. Please also see the Response to No. 7 above.

f. Beginning from the point where the oil or other pollutant reached the water to its confluence with an interstate water or navigable-in-fact water, identify the name and stream status *(e.g.,* ephemeral, intermittent, perennial) of each stream segment between the point where the oil or other pollutant reached the water and that interstate or navigable-in-fact water.

Response: The unnamed tributary is an intermittent or perennial stream. The point of discharge into this unnamed tributary is approximately 1.25 geodesic miles north from its confluence with the Little Missouri River.

g. Describe any film, sheen, discoloration, or iridescent appearance that the discharge caused on the surface of any water or adjoining shorelines. Identify each person making the observation.

Response: The unnamed tributary was frozen at the time of the discharge and the ice that was present was discolored in a spray pattern by the discharge of the crude oil mist over an area approximately 1470 feet by 940 feet in size. This observation was made by James Rust and Dusty Grosulak, representatives of the Halcón EHS Department.

h. Describe any sludge or emulsion deposited on the adjoining shorelines or beneath the surface of the water as a result of the discharge. Identify each

person making the observation.

Response: Sludge or emulsion was not observed due to the frozen ground conditions present at the time of the discharge. This observation was made by James Rust and Dusty Grosulak, representatives of the Halcón EHS Department.

i. Indicate how long the discharged oil or other pollutant remained in or on the water, as well as on any adjoining shoreline.

Response: Cleanup was initiated at approximately 6:00 PM on November 16, 2014 and continued on November 17, 2014. It is believed that the misted oil was in contact with the ice and adjoining shoreline for approximately 25 hours prior to the impacted snow and ice being relocated outside of the unnamed tributary. Due to the frozen ground conditions and ambient air temperature, collection of impacted snow and ice began at 6:00 PM on November 16, 2014, but was not removed from the ice until 8:00 AM on November 17, 2014.

j. If you take the position that any water impacted by the discharge is not a "navigable water" as defined in section 502(7) of the CWA, 33 U.S.C. § 1362(7), explain the basis for this position.

Response: It is believed that this unnamed tributary of the Little Missouri River meets the criteria of a "navigable water," as that term is defined in Section 502(7) of the Clean Water Act, 33 U.S.C. § 1362(7).

13. Describe any damage as a result of the discharge and provide all documents that relate in any way to such damage:

a. to animal life - provide the number and species of injured or dead fish, birds, animals, insects, etc.

Response: No death or injury to animal life was observed as a result of this discharge.

b. to vegetation - describe how many feet, acres, or miles of land were affected, type of vegetation, crops, timber, forest, prairie grasses, scrub, etc.

Response: The investigation of the discharge and third-party surveying identified that the vegetation impacted by the discharge was 1.81 acres. The vegetation within this area consisted of pasture and upland grasses. The survey diagram is enclosed.

14. List and describe any sensitive environments, wildlife habitats or refuges, endangered species, water wells, or drinking water intakes in the area. Describe the location and distance of each from the discharge.

Response: An occupied structure and water well are believed to be located

approximately 0.3 miles northwest of the facility.

15. Provide the date and time the flow of the discharge was diminished until the flow of the discharge was stopped.

    Response: The discharge was discovered on November 16, 2014 at 7:15 AM. At the time of discovery, the wells were not producing due to the high level detected and subsequent emergency shutdown of the facility, thus the discharge was not active when discovered. Following the discovery, 345 gallons of oil present in the flare knockout pots were drained into rubber water troughs. A vacuum truck removed fluid from the flare line and flare.

    a. Describe the steps taken to control and clean up the discharge, including dates and times of each measure.

       Response: On November 16 and 17, 2014, impacted snow and ice within the unnamed tributary were shoveled and removed. Impacted snow and vegetation located outside of the unnamed tributary were collected and removed. This impacted material was stockpiled on location. On November 19, 2014, this material was hauled to a third-party facility for disposal.

    b. Describe the steps taken to mitigate any environmental damage.

       Response: Impacted snow and ice within the unnamed tributary were shoveled and removed. Impacted snow and vegetation located outside of the unnamed tributary were collected and removed. This impacted material was stockpiled on location. On November 19, 2014, this material was hauled to a third-party facility for disposal.

    c. State when the cleanup operations were considered complete and all oil or pollutant removed from any water and/or adjoining shoreline.

       Response: Due to the frozen conditions and snow cover at the time of the discharge, visual observations were able to be performed to accurately delineate the impacted vegetation, snow, and ice. Cleanup operations concluded on November 17, 2014. Soil samples, collected on April 22, 2015, indicated that non-detect and Total Petroleum Hydrocarbon (TPH) concentrations were below the North Dakota Department of Health's cleanup standard of 100 mg/kg in the area of the discharge.

       Halcón's incident briefing utilized during the response of this discharge is enclosed.

16. Was an agent (e.g., dispersant, bioremediation agent, surfactant) used? If it was, provide the following:

    Response: An agent was not used in conjunction with the cleanup of this discharge.

a. the name of agent applied.

Response: N/A

b. the date and time each agent was applied.

Response: N/A

c. the latitude, longitude and datum of each location where the agent was applied, and/or provide a map indicating the locations of all applications.

Response: N/A

d. the method of application and amount of each agent applied.

Response: N/A

e. the name of the person who applied the agent and his or her relationship to the owner and/or operator of the Facility.

Response: N/A

f. Was permission from a Federal On-Scene Coordinator (OSC) granted before the application of any Agent? If so, identify the person who granted this permission, provide the date when it was granted, and provide documentation of permission being granted.

Response: N/A

17. Describe the cause (e.g., equipment failure, operator error, inadequate procedures or maintenance, etc.) of the discharge.

Response: The production facility was believed to have been operating under normal conditions at the time of the discharge. The facility was being operated by Halcón lease operators during the day and contract well watchers were present at the facility during the night. A new contract well watcher started at the facility during the night of November 15, 2014; this individual operated the facility prior to the discharge which occurred during the morning of November 16, 2014. It is believed that fluid levels in the flare knockout pots were not being actively monitored and drained as required during this period. This resulted in the fluid carryover from the knockout pots through the 50-foot flare stack which resulted in the discharge of an oil mist.

a. Describe events leading up to the discharge, including:

1) Describe the operations at the Facility at the time that any indication of a potential discharge was first detected.

Response: The facility was operating under normal conditions prior to the discharge. A Halcón lease operator discovered the discharge upon entering the facility to perform daily production and measurement activities.

2) Describe the daily activities of the individuals working at the Facility prior to the discharge.

Response: Daily activities of the individuals working at the facility included recording production volumes and wellhead pressures, monitoring storage tank levels, monitoring and draining flare knockout pots, as well as general operation of production equipment and performing preventative maintenance as necessary.

3) Describe any procedures for when a discharge is suspected, and provide all documents regarding such procedures.

Response: Halcón evaluates all "near miss" incidents as well as empowers its employees and contractors with Stop Work Authority in order to prevent environmental and health and safety incidents.

Halcón's policy EHS-108, outlining the Company's release reporting and investigation procedures, is enclosed.

4) Identify the persons who work at the Facility, and specifically identify those individuals who were working at the Facility during the 7-day period before the discharge was detected and the 48 hours after the discharge was detected.

Response: Lindsey Hillman was the contract night well watcher present at the facility prior to the discharge. Tristan Williams, a Halcón lease operator, arrived at the facility shortly after the discharge is believed to have occurred.

b. Describe any measures taken or changes at the Facility to prevent any future discharges from the source of the discharge.

Response: An electric pump was installed on the flare line knockout pot to ensure the appropriate removal of fluid accumulation in the vessel. The flare stack knockout pot piping was reconfigured and automation was added in order for the appropriate removal of fluid accumulation in the vessel.

18. Describe all inspections or other investigations that were conducted at the Facility in the year before the discharge. Provide all documents that relate in any way to such inspections or investigations.

Response: Available records for SPCC inspections conducted at the facility during the year prior to the discharge are enclosed.

19. Describe all actions taken by anyone working for you or on your behalf, after there was any indication that there may have been a discharge or problem that could lead to a discharge, to stop the discharge. In your response:

Response: Halcón is not aware of any indication that there may have been a discharge or problem that could lead to a discharge prior to the actual discharge on November 16, 2014. Monitoring and maintaining flare knockout pot fluid levels is a routine task and the responsibility of company and contract lease operators. See also in the Responses to Nos. 4 and 15 above.

a. Describe each step taken by each individual from the time of the first indication that there was an issue with the Facility or any other indication that there might be a potential discharge from the Facility until the time the discharge was stopped;

Response: N/A

b. Identify the persons involved and state their relationship to you;

Response: N/A

c. State the date and time of each action or step taken by each person; and

Response: N/A

d. Provide any documents prepared by those persons, or prepared with input from, or information supplied by, those persons, regarding such actions taken, including any logs that were generated from the time of the first indication that there was an issue with the Facility or any other indication that there might be a potential discharge from the Facility until the time when the discharge was stopped.

Response: N/A

20. List the federal, state, tribal, and/or local agencies to which the discharge was reported. State the date and time of notification and identify the official contacted.

Response: Notification to the North Dakota Industrial Commission and North Dakota Department of Health was provided at 10:03 AM MST on November 16, 2014.
Notification to the Three Affiliated Tribes/MHA Nation and Bureau of Indians Affairs was provided at 10:03 AM MST on November 16, 2014.
Notification to the Bureau of Land Management was provided at 10:03 AM MST on November 16, 2014.
Notification to the National Response Center was provided at 10:09 AM MST on November 16, 2014.

Notification to the Dunn County Emergency Manger and North Dakota Department of Transportation were also provided.

a. For any notifications that were not provided immediately after the time you had knowledge of the discharge, describe why such notifications were delayed.

Response: Halcón contends that all notifications were provided in a timely manner.

b. Identify all persons from federal, state, tribal, and/or local agencies, and those who were working for you, or on your behalf, who were present at or near the location of the discharge at the time of the discharge or during the response thereto, provide the dates they were present, and describe their responsibilities during the discharge or the response thereto.

Response: Halcón's James Rust, Dusty Grosulak, Julia Traster, Tristan Walker, Chris Kelley, and Dan Becker were present at the facility and performed various tasks including spill investigation, cleanup supervision, contractor management, and sample collection.

c. Provide copies of all documents or reports prepared by federal, state, tribal, and/or local agencies regarding the discharge.

Response: Agency documents related to the incident that Halcón is aware of are enclosed.

21. Describe any fines assessed in conjunction with the discharge any governmental entity. Identify the agency, amount of the fines, and the dates assessed, and provide all documents related to such assessment.

Response: No fines or penalties have been assessed by any governmental entity in connection with the discharge.

22. Describe any previous discharges from the Facility within the last five years.

a. State the type of all oil or other pollutant discharged, including the chemical name, formula, and specific gravity. If the material discharged was a mixture, specify the percentages of oil or other pollutant in the mixture or solution. Use this format:

Date Oil or pollutant Source Quantity Waterway Affected/Threatened Cause

Response: Previous discharges from the facility within the last five years.

Incident Date	Oil/Pollutant (Specific Gravity)	Source	Quantity (gal)	Waterway Affected/ Threatened	Cause
2017-03-10	Treated fresh water (specific gravity 1.0)	Tank	22	No	Hot oiler failed to close tank valve completely.
2016-07-28	Produced water (specific gravity > 1.0)	Tank	58.8	No	Contractor failed to close valve on mud tank.
2016-07-25	Hydraulic fluid (specific gravity 0.88)	Hose	23	No	Truck driver backed into BOP accumulator trailer.
2015-05-14	Crude oil (specific gravity 0.79-0.83) (50%) / produced water (specific gravity > 1.0)(50%)	Wellhead	20	No	Polish rod parted.
2014-11-16 (Discharge at issue in this Request for Information)	Crude oil (specific gravity 0.79-0.83)	Flare stack	25	Yes	Knockout pot capacity was exceeded which resulted in fluid being conveyed to the flare.
2014-09-25	Crude oil (specific gravity 0.79-0.83)	Charge pump	20	No	Seal in charge pump on LACT failed.
2014-08-19	Hydraulic fluid (specific gravity 0.88)	Tank	20	No	Broken fitting on accumulator tank.
2014-07-16	Crude oil (specific gravity 0.79-0.83)	Flare stack	10	No	Knockout pot capacity was exceeded which resulted in fluid being conveyed to the flare.
2014-06-06	Crude oil (specific gravity 0.79-0.83)	Flare stack	126	No	Improper valve alignment between knockout pot and storage tanks.
2014-05-01	Crude oil (specific gravity 0.79-0.83)	Production vessel	210	No	PRV on production vessel released during well test.

b. Describe any measures, taken to prevent or mitigate future discharges from the Facility following the spills or discharges listed above, and provide all documents related to such measures.

Response: Halcón identified and implemented the following corrective actions for each of the discharges listed above.

Incident Date	Corrective Action
2017-03-10	Procedure was implemented that required personnel to monitor tanks during valve operation to verify proper valve alignment and closure.
2016-07-28	Procedure was implemented with rig crew to perform walkthroughs and verify proper valve alignment and closure upon completion of fluid transfer activities.
2016-07-25	Procedure was implemented to utilize a spotter at times when trucks require driving in reverse at the facility.
2015-05-14	A valve was installed on top of the stuffing box and polish rod was replaced.
2014-11-16 (Discharge at issue in this Request for Information)	Described in the Response to No. 17.b. in this Request for Information.
2014-09-25	Review was performed to identify the root cause of the pump failure.

Incident Date	Corrective Action
2014-08-19	Procedure was implemented to perform a daily inspection of equipment and hydraulic lines prior to startup of equipment.
2014-07-16	Review of automation system was performed to determine issue with lack of functionality of level alarms installed in the flare knockout pot.
2014-06-06	Contract operating company was provided training on proper operation of the facility.
2014-05-01	A review of the pressure relief valve failure was performed.

23. State the total above ground oil storage capacity and the total underground oil storage capacity at the Facility. State capacity, not actual amounts stored at any one point in time.

    Response: Total above ground oil storage capacity at the Yale Pad: 4800 barrels.

24. Does the Facility have a SPCC Plan? If so, provide a copy of the current SPCC Plan and the SPCC Plan in place at the time of the discharge, if different. Include the entire SPCC plan.

    Response: The production facility had a SPCC plan at the time of the discharge. The plan is enclosed. Halcón no longer owns and operates the facility; therefore, Halcón is not in possession of a current SPCC plan for the facility.

25. If the Facility has also submitted a Facility Response Plan (FRP) to the EPA, provide the FRP number and the date it was submitted to the EPA.

    Response: A Facility Response Plan has not been submitted to EPA for this facility.

26. List any applicable EPA, State, County or local governmental identification or permit numbers for the Facility (i.e., NPDES, RCRA, etc.), using the following format.

    Number Facility/Unit Assigned To Issuing Agency Date Issued

    Response: Other than well API numbers, which are provided in the response to 1.a. above, Halcón is not aware of any other such identification or permit numbers for this facility.

27. Provide any additional pertinent information, reports, photographs, etc. that you have related to the discharge and the Facility. Please submit color photographs, or color photocopies of photos. If you have any of the following documentation in your possession, submit copies.

    a. USGS topographic maps (of the Facility and of the discharge),

       Response: A topographic map of the facility location is enclosed. Halcón does not have a shapefile or GIS coordinates to reference the discharge on the topographic map

b. Geographic Information System maps or data,

Response: Halcón does not have Geographic Information System maps or data pertaining to this facility.

c. Aerial photography, both current and historical,

Response: An aerial photograph of the facility and photographs captured from the discharge and cleanup activities are enclosed.

d. Hydrologic flow and fate or transport models,

Response: Halcón does not have hydrologic flow and fate or transport models for this discharge.

e. Wetland and stream functional models,

Response: Halcón does not have wetland and stream functional models for the unnamed tributary adjacent to the facility.

f. Stream profiles and culvert sizes,

Response: Halcón does not have stream profiles and culvert sizes for the unnamed tributary adjacent to the facility.

g. Stream gauge data,

Response: Halcón does not have stream gauge data for the unnamed tributary adjacent to the facility.

h. Precipitation records.

Response: Halcón does not have precipitation records for the facility prior to or after the discharge.

28. Identify the persons who were consulted regarding the response to this RFI and provide their relationships to the owner or operator of the Facility.

Response (relationship to former owner and operator of the Facility provided):
Matthew Sanchez, Halcón employee, EHS department
Kason Kerr, Halcón employee, Legal department
Ashley Phillips, Thompson & Knight LLP, outside legal counsel for Halcón

Halcón Resources Corporation
Responses to Request for Information Concerning NRC Report Nos. 1150650 and 1101365 (Fletcher Pad)

1. Describe the facility (e.g., flowline, gathering line, tank, well and/or tank battery, truck, railcar, etc.) from which the oil or other pollutant was discharged on or about November 14, 2016, and June 14, 2016, (hereinafter referred to as "Facility").

   Response: The facility associated with NRC Report # 1150650 and 1101365 (June 14, 2016) is an oil and gas production facility known as the Fletcher Pad. The release point for the referenced incident was a flare stack. At the time of the incident, the facility consisted of four oil and natural gas wells and associated process equipment and aboveground storage tanks for produced fluids.

   a. Give the lease name and number.

      Response: The four wells included the Fort Berthold 148-94-17D-8-13H (API # 330-250-2795), Fort Berthold 148-94-17D-8-12H (API# 330-250-2794), Fort Berthold 148-94-17D-8-1H (API# 330-250-0930), and Fort Berthold 148-94-17D-8-2H (API# 330-250-1411).

   b. Provide the API numbers and/or other numbers for all wells associated with the Facility.

      Response: See 1.a. above.

   c. Describe the operations and all business activities conducted at the Facility.

      Response: Facility operations included production of oil and natural gas from the wells, with primary oil and water takeaway via LACT/pipeline.

2. Identify the current owner and operator (and percentage ownership interest) of the Facility, and provide the current owner's Dun & Bradstreet number. Also, identify all owners and operators of the Facility for the last two years, and the parent corporation or other entity (if any) of the current owner and operator. If the current owner is not the original owner of the Facility, also state when the current owner purchased the Facility and identify the person from whom the Facility was purchased.

   Response: To our knowledge, the current owner and operator of the facility is Bruin E&P Operating, LLC, a subsidiary of Bruin E&P Partners, LLC. Halcón does not have the Dun & Bradstreet number for Bruin E&P Operating, LLC. The only other owner and operator of the facility within the past two years was HRC Operating Company, LLC (Halcón), a subsidiary of Halcón Resources Corporation. The leases attributable to the facility were previously owned by Halcón Williston I, LLC; they are currently owned by Bruin Williston I, LLC. The parent company to Bruin Williston I, LLC is believed to be Bruin E&P Partners, LLC. The current percentage of ownership interest in the Bruin entities is not known to Halcón. Halcón sold this facility and the associated leases as part of a transaction that closed on September 7, 2017, with an

effective date of June 1, 2017. Bruin commenced operation of the facility on November 21, 2017.

3. Provide the following information for the current owner and operator, the parent of the current owner and operator, and the owner and operator at the time of the discharge (if not the current owner or operator).

Current Owner/Operator/Parent Company:

a. Type of business unit (e.g., corporation, partnership, LLC. etc.).

Response: Bruin Williston I, LLC is a limited liability company and the successor company of Halcón Williston I, LLC. Bruin Williston I, LLC acquired the leases associated with the facility via an acquisition of the entity that owned them (Halcón Williston I, LLC) and subsequently changed the name of the company to Bruin Williston I, LLC. To Halcón's knowledge, Bruin Williston I, LLC is now owned either directly or indirectly by Bruin E&P Partners, LLC. The current owner and operator of the facility is Bruin E&P Operating, LLC (a limited liability company), which is 100% owned by Bruin E&P Partners, LLC (also a limited liability company).

b. The date the business was incorporated or organized. The date the business first acquired ownership in or began operating the Facility.

Response: Halcón Williston I, LLC (the predecessor of Bruin Williston I, LLC) was organized on November 28, 2012. The dates of organization of Bruin E&P Operating, LLC and Bruin E&P Partners, LLC are unknown to Halcón. Bruin first acquired ownership of the facility as part of a transaction that closed on September 7, 2017, with an effective date of June 1, 2017, and Bruin E&P Operating, LLC began operating the facility on November 21, 2017.

c. The state where the business was first incorporated or organized, and the state where it is authorized to do business. Provide copies of all documents filed with the state where the business was incorporated or organized since the time of incorporation or organization until today, and all such documents filed with the State of North Dakota.

Response: Halcón Williston I, LLC (the predecessor of Bruin Williston I, LLC) was first organized in Delaware. Halcón does not have knowledge of where Bruin E&P Operating, LLC and Bruin E&P Partners, LLC were first organized. Each of these companies is authorized to do business in North Dakota, but Halcón has no knowledge of whether these companies are authorized to do business in other states.

d. If the business is a corporation, identify all of its corporate officers. If the business is a limited liability company, identify all of its members and managing members/managers. If the business is a partnership, identify all of its

limited and general partners.

Response: Information pertaining to the members and managing members/managers of the Bruin entities is not publicly available.

e. If the owner and operator of the Facility are different, describe the relationship between them (i.e. employee, subcontractor, lessee, etc.). State when the current operator first began operating the Facility, and when the operator at the time of the discharge first began operating the Facility (if different than the current operator).

Response: The current owner of the underlying leases and the owner and operator of the facility are separate entities but affiliated. Bruin E&P Operating, LLC began operating the facility on November 21, 2017.

Owner and Operator at the Time of the Discharge

a. Type of business unit (e.g., corporation, partnership, LLC. etc.).

Response: Halcón Williston I, LLC, the owner of the underlying leases at the time of the discharge, is a limited liability company and is currently named Bruin Williston I, LLC. HRC Operating, LLC, a limited liability company, was the owner and operator of the facility at the time of the discharge.

b. The date the business was incorporated or organized. The date the business firstacquired ownership in or began operating the Facility.

Response: Halcón Williston I, LLC was organized on November 28, 2012. HRC Operating, LLC was originally formed on March 7, 2007. Halcón Williston I, LLC acquired ownership of the leases associated with the facility and HRC Operating, LLC acquired ownership of the facility as the result of a transaction that closed on December 6, 2012, with an effective date of June 1, 2012. HRC Operating, LLC began operating the Fletcher Pad on March 1, 2013 following acquisition of the site from Petro-Hunt, LLC in the transaction that closed on December 6, 2012.

c. The state where the business was first incorporated or organized, and the state where it is authorized to do business. Provide copies of all documents filed with the state where the business was incorporated or organized since the time of incorporation or organization until today, and all such documents filed with the State of North Dakota.

Response: Halcón Williston I, LLC was first organized in Delaware, was subsequently converted to a Texas entity, and is authorized to do business in North Dakota. HRC Operating, LLC was originally formed in Colorado; it was qualified to do business in North Dakota at the time of the discharge. HRC Operating, LLC is also qualified to do business in Kansas, Montana, Texas, and Utah.

d. If the business is a corporation, identify all of its corporate officers. If the business is a limited liability company, identify all of its members and managing members/managers. If the business is a partnership, identify all of its limited and general partners.

Response: The officers and members of Halcón Williston I, LLC at the time of the discharge are listed below.

- Officers:
  - Floyd Wilson, CEO and President
  - Steve Herod, EVP, Corporate Development
  - Mark Mize, EVP, CFO and Treasurer
  - David Elkouri, EVP and Chief Legal Officer
  - Jon Wright, COO
- Member:
  - Halcón Energy Properties, LLC.

The officers and members of HRC Operating, LLC at the time of each discharge are listed below.

- Officers:
  - Floyd Wilson, CEO and President
  - Steve Herod, EVP, Corporate Development
  - Mark Mize, EVP, CFO and Treasurer
  - David Elkouri, EVP and Chief Legal Officer
  - Jon Wright, COO
- Member:
  - Halcón Energy Properties, Inc.

e. If the owner and operator of the Facility are different, describe the relationship between them (i.e. employee, subcontractor, lessee, etc.). State when the current operator first began operating the Facility, and when the operator at the time of the discharge first began operating the Facility (if different than the current operator).

Response: At the time of the discharge, the owner of the underlying leases and the owner and operator of the facility were separate entities but affiliated. HRC Operating, LLC began operating the Fletcher Pad on March 1, 2013 following acquisition of the site from Petro-Hunt, LLC in the transaction that closed on December 6, 2012.

4. State the time and date of the discharge and how this was determined.

a. When was the discharge discovered (time and date)?

Response: The discharge was discovered at 3:00 PM CST on June 14, 2016.

b. Identify the individual who first discovered the discharge and how that individual discovered it.

Response: A Halcón lease operator, Larry Broughton, discovered the discharge upon entering the facility. The lease operator had been notified of a high fluid level in a separator; this alarm "callout" prompted the site visit that resulted in the discovery of this discharge.

c. Describe how long the discharge continued.

Response: It is believed that the discharge was an instantaneous event that occurred in conjunction with a "gas kick" in the annulus of the well which caused the fluid capacity of the separator to experience a temporary exceedance.

d. State the weather conditions, including temperature, precipitation, cloud cover, etc. during the discharge.

Response: Weather conditions were not recorded; however, it was noted that it was windy at the time of the discharge.

e. Provide all documents that relate in any way to your responses to this question and its subparts.

Response: The internal spill report is enclosed.

5. Describe the oil or other pollutant discharged, including the chemical name, formula, and specific gravity. If the discharge was a mixture, give the percentages of oil or other pollutant in the mixture or solution. Provide copies of the Safety Data Sheets, if available.

Response: The fluid discharge was comprised of crude oil with a specific gravity of 0.79 to 0.83 at 60°F and produced water with a specific gravity of greater than 1.0 at 32°F. The quantity of produced water discharged is not known. It is believed that due to the physical properties of each fluid, the construction of the separator, and function of the flare knockout pot, any produced water discharged through the flare tip was not quantifiable. Due to the presence of hydrogen sulfide within the well stream produced at this facility, the crude oil and produced water are considered sour. A Safety Data Sheet (SDS) for the sour crude and for the sour produced water are enclosed.

6. If the oil or other pollutant discharged is a hazardous substance under section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9601(14), identify that hazardous substance.

Response: Crude oil is not identified as a hazardous substance under section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C §9601(14).

7. Describe the quantity of each oil or other pollutant that was discharged, the quantity of each oil or other pollutant that entered or may have entered any water or its adjoining shorelines, and how those quantities were determined.

   Response: Halcón's internal investigation of the subject incident identified that the total discharged quantity of crude oil was estimated to be 28.86 gallons. Of this quantity, it was determined that 1.46 gallons of this discharge entered Moccasin Creek. The remainder of the discharge, 27.40 gallons of crude oil, was release onto land and vegetation in the area of the facility and did not enter Moccasin Creek. Dimensions of the impacted areas were determined by a site investigation, and the dimensions were then utilized within a volume estimate worksheet to calculate the discharged quantity.

   a. State the type, total capacity and purpose of the Facility, from which each pollutant was discharged.

      Response: The discharge point was a 20-foot vertical flare manufactured by Steffes LLC. Gas from the 2-phase separators, 3-phase heater treaters, and working/breathing/flash gas from the oil and water storage tanks were routed to this flare. At the time of the discharge, the flare was in service at the production facility as an emission control device.

   b. Provide all documents that relate in any way to your determination of such quantities.

      Response: The volume estimate worksheet is enclosed.

8. If the discharge was from a flowline or gathering line also indicate the size and daily throughput of that flowline or gathering line.

   Response: N/A. This discharge relating to this incident was not from a flowline or gathering line.

9. Provide details on the specific location of the discharge, including:

   a. The latitude, longitude, datum, county and state.

      Response: The discharge occurred at 47° 37' 57" N, 102° 40' 36" W in Dunn County, North Dakota.

   b. The street address and city, if applicable.

      Response: N/A. There is no street address for this facility or the location of the discharge.

   c. The township, range, quarter-sections and fractions for rural areas.

Response: The legal description of the discharge is the SESE Section 17 Range 148 West Township 95 North.

10. Describe the land status (i.e. fee, trust, tribal, federal, or allotted) of any lands impacted by the discharge if the discharge occurred within the exterior boundaries of an Indian reservation.

    Response: The discharge occurred on tribal land located within the Fort Berthold Indian Reservation.

11. Provide copies of the analyses of any samples of the discharged oil or other pollutant collected and analyzed, and any other analyses that were conducted as part of the response to the discharge. Describe the locations from which the samples were collected including: latitude, longitude and datum; the date and time the samples were collected; and identify who collected the samples and the laboratory that conducted the analyses.

    Response: Aqueous samples from Moccasin Creek were collected on June 15 and June 17, 2016. Soil samples were collected from areas east and west of the facility on June 17, 2016. Analytical reports for each sampling event provide sample collection and laboratory details. Samples were collected by representatives of the Halcón EHS Department. A site diagram depicts the sample collection locations for each sampling event. The July 14, 2016 closure report to the North Dakota Industrial Commission, which includes the analytical reports and site diagram, is enclosed.

12. State if the oil or other pollutant discharged reached or threatened to reach any waterway or body of water (water) or a water's adjoining shoreline, or any drainage leading to that water, including any wetlands, marshes or sewers. If it did:

    a. Provide the name of that water and drainage leading to that water, and describe it, including its width and depth, flow, direction, and condition at time of discharge *(e.g.,* low, flooded, quiet, turbulent, and dry).

       Response: A mist of crude oil was discharged into Moccasin Creek, which, at this location is characterized by a semi-defined channel among wetlands.

    b. State each use of the water *(e.g.,* drinking, agriculture, ranching, recreation, commerce).

       Response: The water use of Moccasin Creek is unknown.

    c. Describe the overland pathway(s) from the specific source within the Facility to the water and to any drainage connecting to that water, including distance, direction, and elevation. Provide diagrams and topographic or other maps.

       Response: The discharge did not have an overland pathway. Rather, the discharge

was a mist that was released from an elevated flare. The adjoining shoreline of the unnamed tributary is located approximately 350 feet from the flare. Due to windy conditions at the time of the release, the mist traveled north-northwest from the flare tip (20 feet above ground) through the air, impacting both land and Moccasin Creek up to approximately 550 feet from the facility. See also the site map of the affected area included in the Incident Briefing Report provided in the Response to No. 15 below.

d. State the quantity of oil or other pollutant that reached the water and how the amount was determined.

Response: The quantity of oil discharged into Moccasin Creek is uncertain. Only a visible sheen was observed on the surface water. Please also see the response to RFI No. 7 above.

e. State the quantity of oil or other pollutant that did not reach the water and how that amount was determined.

Response: 28.86 gallons of crude oil were discharged from the flare. A small portion of the discharge impacted Moccasin Creek, appearing as a spray pattern of visible sheen. The quantity of this discharge was determined based on a site investigation and utilization of a volume calculator by Halcón to determine released quantities. Please also see the Response to No. 7 above.

f. Beginning from the point where the oil or other pollutant reached the water to its confluence with an interstate water or navigable-in-fact water, identify the name and stream status *(e.g.,* ephemeral, intermittent, perennial) of each stream segment between the point where the oil or other pollutant reached the water and that interstate or navigable-in-fact water.

Response: Moccasin Creek is believed to be a perennial or intermittent stream. The point of discharge into Moccasin Creek is approximately 10.35 geodesic miles west-northwest from its convergence with Lake Sakakawea.

g. Describe any film, sheen, discoloration, or iridescent appearance that the discharge caused on the surface of any water or adjoining shorelines. Identify each person making the observation.

Response: A spray-patterned sheen was observed on surface water within Moccasin Creek immediately following the discharge of crude oil over an area approximately 200 feet by 75 feet in size. This observation was made by Julia Traster, Halcón EHS Department.

h. Describe any sludge or emulsion deposited on the adjoining shorelines or beneath the surface of the water as a result of the discharge. Identify each person making the observation.

Response: Deposited sludge or emulsion was not noted within Moccasin Creek following the discharge of crude oil. This observation was made by Julia Traster, Halcón EHS Department.

i. Indicate how long the discharged oil or other pollutant remained in or on the water, as well as on any adjoining shoreline.

Response: Absorbent booms were placed and underflow dams were constructed in Moccasin Creek within the first six hours upon discovery of the discharge. It is believed that cleanup actions to address the discharge of oil to Moccasin Creek were initiated upon identification of the discharge to Moccasin Creek on June 14, 2016.

j. If you take the position that any water impacted by the discharge is not a "navigable water" as defined in section 502(7) of the CWA, 33 U.S.C. § 1362(7), explain the basis for this position.

Response: Moccasin Creek is believed to meet the criteria of a "navigable water," as that term is defined in Section 502(7) of the Clean Water Act, 33 U.S.C. § 1362(7).

13. Describe any damage as a result of the discharge and provide all documents that relate in any way to such damage:

a. to animal life - provide the number and species of injured or dead fish, birds, animals, insects, etc.

Response: No death or injury to animal life was observed as a result of this discharge.

b. to vegetation - describe how many feet, acres, or miles of land were affected, type of vegetation, crops, timber, forest, prairie grasses, scrub, etc.

Response: The initial investigation indicated that a 15,000 ft^2 area outside of the production facility was impacted by the discharge. The vegetation within this area consisted of upland grasses and shrubs.

14. List and describe any sensitive environments, wildlife habitats or refuges, endangered species, water wells, or drinking water intakes in the area. Describe the location and distance of each from the discharge.

Response: An occupied structure is believed to be located approximately 0.3 miles southwest of the facility.

15. Provide the date and time the flow of the discharge was diminished until the flow of the discharge was stopped.

Response: The flow of discharge was not active at the time of discovery. It is believed that the discharge was an instantaneous event that occurred in conjunction with a "gas kick" in the annulus of the well which caused the fluid capacity of the separator to experience a temporary exceedance.

a. Describe the steps taken to control and clean up the discharge, including dates and times of each measure.

   Response: Impacted vegetation was mowed and clippings collected. A boom was placed in Moccasin Creek and upgradient of the creek to prevent runoff from another portion of the impacted area. Two handmade underflow dams were constructed in the creek. These activities occurred on June 14, 2016. Impacted scoria located on the well pad surrounding the flare was removed and clean scoria was replaced.

b. Describe the steps taken to mitigate any environmental damage.

   Response: Impacted vegetation was mowed and clippings collected. A boom was placed in Moccasin Creek and upgrade of the creek to prevent runoff from another portion of the impacted area. Two handmade underflow dams were constructed in the creek. These activities occurred on June 14, 2016.

c. State when the cleanup operations were considered complete and all oil or pollutant removed from any water and/or adjoining shoreline.

   Response: The cleanup operations were considered complete subsequent to the review of the analytical results from the June 17, 2016 sampling event. A closure report was submitted to the North Dakota Industrial Commission on July 14, 2016.

16. Was an agent (e.g., dispersant, bioremediation agent, surfactant) used? If it was, provide the following:

    a. the name of agent applied.

       Response: An aqueous solution of BioFast^{TM} and fresh water was applied to vegetation surrounding Moccasin Creek observed to be affected.

    b. the date and time each agent was applied.

       Response: June 14, 2016 (time of application was not recorded).

    c. the latitude, longitude and datum of each location where the agent was applied, and/or provide a map indicating the locations of all applications.

       Response: The specific area of application was not recorded.

    d. the method of application and amount of each agent applied.

Response: Method and amount of application was not recorded.

e. the name of the person who applied the agent and his or her relationship to the owner and/or operator of the Facility.

Response: Julia Traster, Halcón EHS representative, is believed to be the individual responsible for the application.

f. Was permission from a Federal On-Scene Coordinator (OSC) granted before the application of any Agent? If so, identify the person who granted this permission, provide the date when it was granted, and provide documentation of permission being granted.

g.

Response: It is not known whether permission from a Federal On-Scene Coordinator was provided prior to the application of the above agent. A SDS for the agent utilized in response to this discharge is enclosed.

17. Describe the cause (e.g., equipment failure, operator error, inadequate procedures or maintenance, etc.) of the discharge.

Response: The production facility was believed to have experienced increased production due to unforeseen downhole conditions. The downhole condition is commonly referred to as "backside" or "gas kick," whereby a difference in formation and annular pressures results in sudden increase of gas and fluid production between the tubing and casing. Well production exceeded the capacities of the onsite separation equipment which consisted of a two-phase separator and a three-phase heater treater. Crude oil was conveyed out of the heater treater through the flare line which exceeded the capacity of the knockout pot on the flare line. Crude oil was conveyed to the 20-foot above-ground flare tip and due to the pressure on the flare line, was discharged in a mist.

a. Describe events leading up to the discharge, including:

1) Describe the operations at the Facility at the time that any indication of a potential discharge was first detected.

Response: The facility was operating under normal conditions prior to the unexpected increase in well production. "Backside kicks" occur periodically, but these events occur without warning or indication that a kick may be imminent.

2) Describe the daily activities of the individuals working at the Facility prior to the discharge.

Response: Daily activities of the individuals working at the production facility included recording production volumes and wellhead pressures,

monitoring storage tank levels, monitoring and draining flare knockout pots, as well as general operation of production equipment and performing preventative maintenance as necessary.

3) Describe any procedures for when a discharge is suspected, and provide all documents regarding such procedures.

Response: Halcón evaluates all "near miss" incidents as well as empowers its employees and contractors with Stop Work Authority in order to prevent environmental and health and safety incidents.

Halcón's policy EHS-108, outlining the Company's release reporting and investigation procedures, is enclosed.

4) Identify the persons who work at the Facility, and specifically identify those individuals who were working at the Facility during the 7-day period before the discharge was detected and the 48 hours after the discharge was detected.

Response: Larry Broughton, a Halcón lease operator, was likely present at the facility prior to the discharge. Due to the high level callout received by Mr. Broughton during the afternoon of June 14, 2016, he entered the site at approximately 3:00 PM at which time the discharge was discovered.

b. Describe any measures taken or changes at the Facility to prevent any future discharges from the source of the discharge.

Response: The facility automation and "safety system" was reviewed. A high level switch and electric pump were installed in the flare pot to ensure appropriate fluid levels would be maintained in the vessel. A high level switch was also installed in the flare pot which enabled all production from the facility to be shut in if a high level was detected. The review of this discharge identified that the emergency shutdown capabilities of high level and high pressure alarms installed in the separator were not functioning at the time of the discharge. Due to previous functionality and communication issues experienced with the facility's supervisory control and data acquisition ("SCADA") system, shutdown functionality had been disabled, but had inadvertently not been reinstated upon resolving the SCADA system deficiencies. Following the discharge, the shutdown function was reinstated.

18. Describe all inspections or other investigations that were conducted at the Facility in the year before the discharge. Provide all documents that relate in any way to such inspections or investigations.

Response: Available records for SPCC inspections conducted at the facility during the year prior to the discharge are enclosed.

19. Describe all actions taken by anyone working for you or on your behalf, after there was any indication that there may have been a discharge or problem that could lead to a discharge, to stop the discharge. In your response:

Response: Halcón is not aware of any indication that there may have been a discharge or problem that could lead to a discharge prior to the actual discharge on June 14, 2016. "Backside kicks" occur periodically, but these events occur without warning or indication that a kick may be imminent. See also the Responses to Nos. 4 and 15 above.

a. Describe each step taken by each individual from the time of the first indication that there was an issue with the Facility or any other indication that there might be a potential discharge from the Facility until the time the discharge was stopped;

Response: N/A

b. Identify the persons involved and state their relationship to you;

Response: N/A

c. State the date and time of each action or step taken by each person; and

Response: N/A

d. Provide any documents prepared by those persons, or prepared with input from, or information supplied by, those persons, regarding such actions taken, including any logs that were generated from the time of the first indication that there was an issue with the Facility or any other indication that there might be a potential discharge from the Facility until the time when the discharge was stopped.

Response: N/A

20. List the federal, state, tribal, and/or local agencies to which the discharge was reported. State the date and time of notification and identify the official contacted.

Response: Notification to the North Dakota Industrial Commission and North Dakota Department of Health was provided at 4:07 PM MST on June 14, 2016.
Notification to the Three Affiliated Tribes/MHA Nation and Bureau of Indians Affairs was provided at 4:07 PM MST on June 14, 2016.
Notification to the Bureau of Land Management was provided at 4:07 PM MST on June 14, 2016.
Notification to the National Response Center was provided at 4:19 PM MST on June 14, 2016.

a. For any notifications that were not provided immediately after the time you had

knowledge of the discharge, describe why such notifications were delayed.

Response: Halcón contends that all notifications were provided in a timely manner.

b. Identify all persons from federal, state, tribal, and/or local agencies, and those who were working for you, or on your behalf, who were present at or near the location of the discharge at the time of the discharge or during the response thereto, provide the dates they were present, and describe their responsibilities during the discharge or the response thereto.

Response: Felicia Dickens, BIA, was present on June 15, 2016 to observe the area affected by the discharge and cleanup activities. Allen Christensen and another representative from the NDIC were present on June 15, 2016 to observe the area affected by the discharge and cleanup activities. Halcón's James Rust, Pat Krebs, Julia Traster, Anthony Chopin, and Tristan Walker, were present at the facility and performed various tasks including spill investigation, cleanup supervision, contractor management, and sample collection.

c. Provide copies of all documents or reports prepared by federal, state, tribal, and/or local agencies regarding the discharge.

Response: Agency documents related to the incident that Halcón is aware of are enclosed.

21. Describe any fines assessed in conjunction with the discharge any governmental entity. Identify the agency, amount of the fines, and the dates assessed, and provide all documents related to such assessment.

Response: No fines or penalties have been assessed by any governmental entity in connection with the discharge.

22. Describe any previous discharges from the Facility within the last five years.

a. State the type of all oil or other pollutant discharged, including the chemical name, formula, and specific gravity. If the material discharged was a mixture, specify the percentages of oil or other pollutant in the mixture or solution. Use this format:

Date	Oil or pollutant	Source	Quantity	Waterway Affected/Threatened	Cause

Response: Previous discharges from the facility within the last five years.

Incident Date	Oil/Pollutant (Specific Gravity)	Source	Quantity (gal)	Waterway Affected/ Threatened	Cause
2016-09-20	Crude oil (specific gravity 0.79-0.83) (50%) / produced water (specific gravity > 1.0)(50%)	Wellhead	1.2	No	Stuffing box packing leaked.
2016-06-20	Crude oil (specific gravity 0.79-0.83)	Separator	1	No	Backside kick that overpressured separator.
2016-06-14 (Discharge at issue in this Request for Information)	Crude oil (specific gravity 0.79-0.83)	Flare	25	Yes	Production exceeded capacity of separation vessels.
2016-04-23	Crude oil (specific gravity 0.79-0.83) (50%) / produced water (specific gravity > 1.0)(50%)	Wellhead	20	No	Well unexpectedly gassed while tripping into well.
2016-04-19	Crude oil (specific gravity 0.79-0.83) (50%) / produced water (specific gravity > 1.0)(50%)	Wellhead	4	No	Well tubing kicked while pulling rods.
2016-03-24	Crude oil (specific gravity 0.79-0.83) (50%) / produced water (specific gravity > 1.0)(50%)	Wellhead	14	No	Stuffing box rubbers leaked.
2016-01-16	Crude oil (specific gravity 0.79-0.83) (50%) / produced water (specific gravity > 1.0)(50%)	Wellhead	5	No	Stuffing box was overpressured prior to being equipped with automation.
2015-08-31	Crude oil (specific gravity 0.79-0.83)	Flare	71.4	No	ESD valve failed sending fluid to flare.
2015-06-06	Hydraulic fluid (specific gravity 0.88)	Hose	4	No	Hydraulic hose failed on telehandler.
2014-08-13	Crude oil (specific gravity 0.79-0.83)	Heater Treater	63	No	Gasket on heater treater failed.
2014-02-27	Crude oil (specific gravity 0.79-0.83)	Wellhead	38.7	No	Wellhead tubing gauge failed.
2014-02-20	Crude oil (specific gravity 0.79-0.83)	Wellhead	33.6	No	Gauge failed.

b. Describe any measures, taken to prevent or mitigate future discharges from the Facility following the spills or discharges listed above, and provide all documents related to such measures.

Response: Halcón identified and implemented the following corrective actions for each of the discharges listed above.

Incident Date	Corrective Action
2016-09-20	Replaced stuffing box rubbers.
2016-06-20	Review of automation and operating parameters: verified high level shutdown for timing of production shutdown. Pressure relief valve on 2-phase separator set at 250 psi.
2016-06-14 (Discharge at issue in this Request for Information)	Described in this Request for Information.
2016-04-23	A procedure to circulate oil and produced fluids from the well when fluids are being displaced was implemented while tripping in a well.
2016-04-19	Tubing was filled with heavy brine water. Blowout preventer for rod string was closed along with the closure of the manual wiper.
2016-03-24	Replaced stuffing box rubbers.
2016-01-16	Process improvement was implemented to increase communication between field personnel and automation personnel to nofify of new pumping unit installations.
2015-08-31	Defective ESD valve was replaced.
2015-06-06	Repairs were performed on hydraulic hose prior to placing the equipment back into service.
2014-08-13	Failed gasket was replaced prior to placing the equipment back into service.
2014-02-27	A procedure was implemented to ensure pressure gauges were inspected prior to placing into service.
2014-02-20	Lease operators performed visual inspections of pressure gauges at all production facilities and replaced gauges with any indication of integrity deficiency.

23. State the total above ground oil storage capacity and the total underground oil storage capacity at the Facility. State capacity, not actual amounts stored at any one point in time.

    Response: Total above ground oil storage capacity at the Fletcher Pad: 4806.5 barrels.

24. Does the Facility have a SPCC Plan? If so, provide a copy of the current SPCC Plan and the SPCC Plan in place at the time of the discharge, if different. Include the entire SPCC plan.

    Response: The production facility had a SPCC plan at the time of the discharge. The plan is enclosed. Halcón no longer owns and operates the facility; therefore, Halcón is not in possession of a current SPCC plan for the facility.

25. If the Facility has also submitted a Facility Response Plan (FRP) to the EPA, provide the FRP number and the date it was submitted to the EPA.

    Response: A Facility Response Plan has not been submitted to EPA for this facility.

26. List any applicable EPA, State, County or local governmental identification or permit numbers for the Facility (i.e., NPDES, RCRA, etc.), using the following format.

Number	Facility/Unit Assigned To	Issuing Agency	Date Issued

Response: EPA, State, County or local government identification or permit numbers are not believed to exist for this facility.

27. Provide any additional pertinent information, reports, photographs, etc. that you have related to the discharge and the Facility. Please submit color photographs, or color photocopies of photos. If you have any of the following documentation in your possession, submit copies.

    a. USGS topographic maps (of the Facility and of the discharge),

       Response: A topographic map of the facility location is enclosed. Halcón does not have a shapefile or GIS coordinates to reference the discharge on the topographic map.

    b. Geographic Information System maps or data,

       Response: Halcón does not have Geographic Information System maps or data pertaining to this facility.

    c. Aerial photography, both current and historical,

       Response: An aerial photograph of the facility and photographs captured from the discharge and cleanup activities are enclosed.

    d. Hydrologic flow and fate or transport models,

       Response: Halcón does not have hydrologic flow and fate or transport models for this discharge.

    e. Wetland and stream functional models,

       Response: Halcón does not have wetland and stream functional models for Moccasin Creek.

    f. Stream profiles and culvert sizes,

       Response: Halcón does not have stream profiles and culvert sizes for Moccasin Creek.

    g. Stream gauge data,

       Response: Halcón does not have stream gauge data for Moccasin Creek.

h. Precipitation records.

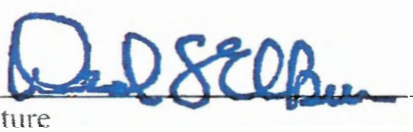
Response: Halcón does not have precipitation records for the facility prior to or after the discharge.

28. Identify the persons who were consulted regarding the response to this RFI and provide their relationships to the owner or operator of the Facility.

Response (relationship to former owner and operator of the Facility provided):
Matt Sanchez, Halcón employee, EHS department.
Kason Kerr, Halcón employee, Legal department.
Ashley Phillips, Thompson & Knight LLP, outside legal counsel for Halcón.

STATEMENT OF CERTIFICATION

I certify under the penalty of law, that I have personally examined and am familiar with the information submitted in this document and all attachments, and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information.



Signature

10.12.18
Date

David S. Elkouri
Printed Name

EVP + Chief Legal Officer,
Title and Name of Company
Halcón Resources Corporation

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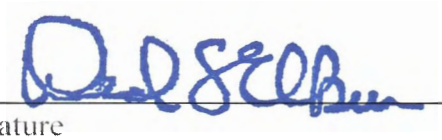

Signature

10.12.18
Date

David S. Elkouri
Printed Name

EVP + Chief Legal Officer,
Halcón Resources Corporation
Title and Name of Company